

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:

SURESH VENKAT DOKI,

Debtor

Case No. 19-11503-KHK
(Chapter 11)

MOTION FOR LEAVE TO WITHDRAW AS DEBTOR'S COUNSEL

TO THE HONORABLE KLINETTE H. KINDRED, BANKRUPTCY JUDGE:

COMES NOW the Law Offices of Jeffrey M. Sherman ("Attorneys"), currently counsel of record for Suresh Venkat Doki ("Debtor"), and as its Motion for Leave to Withdraw as Debtor's Counsel ("Motion"), respectfully represents as follows:

1. The Attorneys filed their application for approval of their retention as Debtor's counsel on June 2, 2019 (Docket No. 24). An order approving the retention was recently entered by the Court.

2. Pursuant to LBR 2090-1(G), counsel of record may not withdraw their appearance except "for cause, on order of the Court after reasonable notice to the party on whose behalf the attorney has appeared...."

3. The Attorneys wish to withdraw from the representation of the Debtor, and have their appearance on his behalf stricken from the record of this case, for cause: (a) the working relationship between the Debtor and the Attorneys has deteriorated to the point where it is unmanageable, and has compromised the ability of the Attorneys to further render independent advice to the Debtor; and (b) other matters exist as to which full disclosure is barred by the attorney-client privilege.

4. *The Debtor has indicated his consent to this withdrawal*, and has also been advised,

by electronic communication on this date, that (a) he may proceed in this action, and in any other action related or associated with the parties or issues in this case, on a *pro se* basis, or (b) may seek to engage and retain substitute counsel for this case or any other related or associated proceedings, and as to such substitute counsel, the Attorneys would provide briefings and information on the known background and current state of this case, current issues, current procedural posture, and applicable deadlines, at no cost to the Debtor.

5. The disappointing deterioration of the working relationship with the Debtor has left the Attorneys with no choice but to seek to withdraw, and thus, by this Motion, they seek leave to withdraw and to have their appearance on behalf of the Debtor stricken from this case.

6. The Attorneys reserve the right to seek compensation for services rendered and expenses incurred in the course of the representation of the Debtor herein, through the date of the withdrawal and striking of their appearance.

WHEREFORE, the Attorneys respectfully requests that the Court:

1. Grant this Motion;
2. Allow the Attorneys leave to withdraw from the further representation of the Debtor;
3. Striking the appearance of the Attorneys as counsel for the Debtor from the record of this case; and
4. Granting the Attorneys such other and further relief as is just and proper.

Dated: July 1, 2019

Respectfully submitted,

/s/ Jeffrey M. Sherman

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on July 1, 2019, by first class mail, postage prepaid, and, where available, by electronic transmission, upon the following:

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/s/ Jeffrey M. Sherman
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